

EXHIBIT 1

From: [Lori Johnson](#)
To: [Bloom, Michael](#); [Andrew Parker](#)
Cc: [Joe Pull](#); [Abraham S. Kaplan](#); [Roxanne A. Russell](#); [Jill Thorvig](#); [Frey, Timothy](#); [Ward, Jamie](#); [Loftus, Julie](#); [Manske, William E.](#)
Subject: RE: Smartmatic v. Lindell, et al., Case No. 22-cv-00098 - Proposed Order
Date: Tuesday, September 5, 2023 12:50:25 PM
Attachments: [image005.png](#)
[image002.png](#)
[image003.png](#)

Mike,

Defendants do not agree to a 7-day extension. As noted in our papers, Defendants' expert will need to inspect Smartmatic's software and BMD. With the expert deadline quickly approaching, we cannot afford the delay of another week.

Lori

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From: Bloom, Michael <MBloom@beneschlaw.com>
Sent: Sunday, September 3, 2023 8:48 PM
To: Andrew Parker <Parker@parkerdk.com>
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Subject: FW: Smartmatic v. Lindell, et al., Case No. 22-cv-00098 - Proposed Order

Hi Andrew,

On Tuesday, we plan to ask the Court for an additional 7 days to respond to Defendants' motion so can verify Defendants' assertions regarding LA County and prepare any necessary declarations. We will also request that the Court commensurately move the hearing date that Defendants scheduled. Please let me know if Defendants will stipulate to this relief or if Smartmatic will need to file a motion.

Thanks,

Mike



Michael E. Bloom
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From: Jill Thorvig <Thorvig@parkerdk.com>

Sent: Friday, September 1, 2023 11:41 PM

To: docherty_chambers@mnd.uscourts.gov

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Subject: Smartmatic v. Lindell, et al., Case No. 22-cv-00098 - Proposed Order

Honorable Judge Docherty,

Attached with respect to the above-referenced matter, please find a Microsoft Word version of the Proposed Order Granting Defendants' Motion for Partial Reconsideration, e-filed as Docket No. 181.

PARKER | DANIELS | KIBORT
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